

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 04-10360-DPW
	)	
CARLOS MEDINA	)	
	)	

**JOINT MOTION FOR ORDER TO EXCLUDE PERIOD FROM  
MARCH 15, 2005 THROUGH APRIL 4, 2005 FROM SPEEDY  
TRIAL ACT COMPUTATION**

The United States of America, by Assistant U.S. Attorney James F. Lang, and the defendant Carlos Medina, by counsel Martin Richey, Esq., jointly move pursuant to 18 U.S.C. § 3161(h)(8)(A) and Local Rule 112.2(A)(2) that the period of time from March 15, 2005, the date of the interim status conference, until April 4, 2005, the date of the final status conference, be excluded from computation under the Speedy Trial Act of the time within this case must be tried. As reason therefore, the parties represent that the defendant requested this additional time to complete review of discovery and to determine whether the case will be resolved by plea or trial. It is therefore in the interests of justice that the instant motion be allowed.

WHEREFORE, the parties request that the Court enter a written order of excludable delay covering the period of March 15, 2005 through April 4, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ James Lang  
James Lang  
Assistant U.S. Attorney

CARLOS MEDINA  
Defendant

By: /s/ Martin Richey  
Martin Richey  
Counsel for Carlos Medina

DATE: March 23, 2005